

Toxic Substances Control Act  
TSCA Section 6(e) PCB Inspection

G & G Auto/FNJ Enterprises

**G & G Auto**  
44 Albe Drive  
Newark, Delaware 19702

**FNJ Enterprises**  
1354 Porter Road  
Bear, Delaware

2480 McCoy Road  
Bear, Delaware 19701

1476 Kirkwood St. Georges Road  
Bear, Delaware 19701

Investigation: February 7, 2014  
Gerard Crutchley - OECEJ (3EC10)  
Final Report - 3/13/14

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Dates of Investigation: February 7, 2014

EPA Representatives:

Gerard Crutchley  
Environmental Protection Specialist  
(410) 305-2780

Justin Young  
Physical Scientist  
(410) 305-3029

Facility Representatives:

Georges Jean-Louis  
Owner - G & G Auto  
(302)525-9253

Franco Fregapane  
Owner- FNJ Enterprises  
(302) 838-2830  
(302) 836-2835

## **Background**

The EPA, Region III's Office of Enforcement, Compliance and Environmental Justice (OECEJ) at Fort Meade, Maryland received a request from EPA, Region III's Land & Chemicals Division, Toxics Programs Branch to conduct some additional investigative work in support of an ongoing TSCA PCB case involving two companies located in Delaware. As part of the ongoing investigation, the Toxics Programs Branch also requested the OECEJ personnel to serve TSCA Subpoenas to two individuals who are the listed owners/operators of the two companies involved in the case. Specifically the TSCA Subpoenas are addressed to Mr. Georges Jean-Louis, G & G Auto, 44 Albe Drive, Newark, Delaware and Mr. Franco Fregapane, FNJ Enterprises, listed as having operated at four separate locations in the Bear, Delaware area. The OECEJ personnel conducting the investigations are Gerard Crutchley and Justin Young. The scheduled date for the additional work is February 7, 2014.

## **Inspection Observations/Activities**

On February 7, 2014, OECEJ personnel, Gerard Crutchley and Justin Young travelled to G & G Auto located at 44 Albe Drive, Newark, Delaware in an attempt to locate Mr. Georges Jean-Louis, Owner of G & G Auto. The inspectors arrived at the site at approximately 9:30am. The building consists of two adjoining sides. One side is listed as Suite 100 and houses G & G Auto. The other side is listed as Suite 200 which houses a separate auto repair business. The inspectors initially entered the building housing G & G Auto (Suite 100) through the outside door. This entrance leads to a small hallway which contains a second doorway which is the entrance to the actual garage area. This door was locked and the inspectors knocked on the door several times but there was no response. The inspectors went outside of the building and went to the adjoining garage area (Suite 200) to see if anyone working in this garage might know the whereabouts of Mr. Jean-Louis. The outside entry to this garage was locked. The inspectors knocked on the door several times but there was no response. The inspectors next walked around the outside perimeter of the building and observed another doorway on the southeast end of the building which appeared to be part of Suite 100 (G & G Auto). The inspectors knocked on this door, but again there was no response.

The inspectors did observe that the waste oil tank located outside of Suite 100 that had been sampled by the EPA inspectors during a previous inspection of the site (12/18/13) was now marked with a sign which stated "DO NOT REMOVE – CONTAMINATED OIL, Toxic Levels of PCBs, DO NOT REMOVE" (See Photo No. 1). The inspectors also noted that the cap on the bung opening on the top left side of the tank had been replaced with a new cap that was now secured with a lock. The inspectors also observed that the three 55 gallon drums (two blue plastic drums and one red metal drum) observed during the two previous inspections of the facility were still in the same location outside of the building. The only difference noted was that the red metal drum has since been marked with spray paint to indicate that it contained PCBs (See Photo No. 2). The inspectors also observed four other drums that were stored in a nearby area under a cloth tarp (See Photo No. 3). The four drums were 55 gallon metal drums. Two of the drums were marked with the word "gas". The other two drums were black metal drums and there were no visible markings on these drums. The inspectors could not determine if the drums were full, partially full or empty.

The inspectors next took several pictures of the building and the adjacent area where the drums are stored (See Photo Nos. 4, 5, 6 & 7). Photo No. 4 depicts the entry door and garage door to G & G Auto. Photo No. 5 depicts the location of the outdoor waste oil tank and one of the garage doors to the adjoining car repair business (Suite 200). Photo No. 6 depicts another garage door and the entry door to Suite 200). Photo No. 7 depicts an area adjacent to the building where several old vehicles are stored. All of the drums stored outside are located to the left and the right of the yellow van truck depicted in Photo No. 7.

At approximately 9:55am, the inspectors observed a vehicle drive up and park in front of the garage door to the Suite 200 portion of the building. The inspectors approached the person in the vehicle and asked him if he worked at that location. The person's name is Jerry Elias and he said that he works part time for Mr. Johnson Okeke, the owner of the car repair business occupying Suite 200 in the building. Mr. Elias said that he does know Mr. Jean -Louis and he also said that Mr. Jean-Louis is usually at the site every day. He also said that his boss, Mr. Okeke, should be showing up in about 15 to 30 minutes. The inspectors asked Mr. Elias if he knew of any business agreements between Mr. Jean-Louis and Mr. Okeke. Mr. Elias said that he did not know of any agreements between those two individuals.

The inspectors next observed the outside area just to the southeast of the building housing G & G Auto. In this area they observed two large open storage boxes containing various pieces of equipment. Adjacent to the storage boxes, the inspectors observed five 55 gallon drums and a number of trucks marked with the name "Highway Markings Inc". The inspectors went to the building across from this area to a doorway marked with the same name. The inspectors went into the building and met with a person working in the area. This person stated that he owned the Highway Markings business. The inspectors asked this person if he knew Mr. Jean-Louis, but the man stated that he did not know Mr. Jean-Louis. He did say that he saw some personnel from DNREC at the G & G Auto site sometime just after Christmas.

At this time, approximately 10:25am, the EPA inspectors left the site and drove to the 4376 Kirkwood St. Georges Road address in Bear, Delaware (current listed address of FNJ Enterprises) in an attempt to locate Mr. Franco Fregapane. Mr. Fregapane is the listed owner of FNJ Enterprises. The inspectors arrived at this location at approximately 10:40am. The doorway to the portion of the building occupied by FNJ Enterprises was locked. The inspectors knocked several times on the doorway, but there was no response. The inspectors then left that site and drove to 2480 McCoy Road believed to be the listed residence of Mr. Fregapane (See Photo No 8). The inspectors arrived at that location at approximately 10:47 and observed one vehicle parked in the driveway and another vehicle parked outside of several outer buildings toward the rear of the property (See Photo No. 9). The inspectors did go to the front door of the residence and rang the doorbell and also knocked on the door, but there was no response. The inspectors then left this site and returned to the 4376 Kirkwood St. Georges Road location. There was still no one at that location. The inspectors did take two photographs of the building (See Photo Nos. 10 & 11). The inspectors then left this location at approximately 11:25am.

The inspectors travelled back to the 44 Albe Drive location and arrived there at approximately 11:43am. The inspectors observed that the outer entry door to Suite 100 (G & G Auto) was now open.

The inspectors entered the building and met with Mr. Georges Jean-Louis. The inspectors presented their credentials to Mr. Jean-Louis identifying them as authorized representatives of the Agency. The EPA inspectors began to ask Mr. Jean-Louis the questions that are in the TSCA Subpoena, No. 476 (See Attachment No. 1). Mr. Jean-Louis provided the following responses to those questions:

1. State the name, address and telephone number of the person from whom you picked up the drums of oil that you subsequently offered to Heritage-Crystal Clean for disposal or recycling on or about October 15, 2013.

*Mr. Jean-Louis stated that he picked up five drums from Mr. Franco Fregapane at his business location in Bear, Delaware.*

2. What is the address of the location from which the drums were picked up and transported to G & G Auto?

*Mr. Jean-Louis stated that he picked up the drums at 4376 Kirkwood St. Georges Road location. He further stated it was from the same building that houses Kraemer & Sons Towing.*

3. Did you pick up and transport the drums to G & G personally? If not, state the name, address and telephone number of the person who did pick up and transport the drums to G & G Auto. If you picked up the drums, how did you transport the drums to G & G Auto? Did you use your personal or business vehicle or did you rent a vehicle to transport the drums to G & G Auto?

*Mr. Jean-Louis stated that he used his own pickup truck and a trailer to pick up and deliver the drums to G & G Auto.*

4. What did the person from whom you received the drums ask you to do with the drums? Please be specific. Was it a verbal or written request?

*Mr. Jean-Louis stated that Mr. Fregapane contacted him and said that he had moved to a new location (4376 Kirkwood St. Georges Road) and that the waste oil haulers do not stop at that location. Mr. Jean-Louis said that Mr. Fregapane told him that he had five drums of used oil that he had recovered from scrap vehicles and he asked Mr. Jean-Louis if he could take the drums and have them disposed of through his used oil hauler.*

5. Were there actually 5 drums? If not, how many drums did you pick up or were delivered to G & G Auto?

*Mr. Jean-Louis stated there were five 55 gallon drums.*

6. On what date did you or another person pick up those drums? If you don't know the exact date, provide the month and year when you picked them up and state whether it was on a week day or weekend.

*Mr. Jean-Louis stated that he did not recall the exact date, but it was in October 2013 and it was a weekday when he picked up the drums.*

7. Did the person from whom you obtained the drums identify the source of the oil and type of equipment from which he obtained it?

*Mr. Jean-Louis stated that Mr. Fregapane told him the five drums contained used oil and some diesel fuel. He again stated that Fregapane told him the materials in the drums were recovered from scrap vehicles.*

8. Did the person from whom you obtained the drums state how that person obtained the liquid contained in each drum?

*Mr. Jean-Louis again stated that Mr. Fregapane told him the liquids in the drums came from scrap vehicles.*

9. Who removed the liquid from each of those drums and where was the liquid placed?

*Mr. Jean-Louis stated that some of the liquid was removed from the drums by Heritage -Crystal Clean and the remaining liquid was placed into the onsite used oil tank at G & G Auto.*

10. After the liquid was removed from each of the five drums, was any other liquid or solid placed in any of those drums? After the oil was removed from each of the five drums, did you or anyone else rinse any of the drums? If so, what was added to each drum and why was that substance added? Who added the substance to each drum or rinsed it? When did that person add the substance or rinse the drum?

*Mr. Jean-Louis stated that one of the drums is currently being used to accumulate used oil that he recovers from vehicles in his business. He indicated this drum is outside next to the waste oil tank. He said the other four drums are also outside, but nothing has been added to those drums since they were emptied.*

11. Describe what happened to each and every drum obtained from the person who provided the drums referred to above after the liquid was removed from it. Where is each drum located now?

*Again Mr. Jean-Louis stated that one of the drums is outside next to the waste oil tank and is being used to accumulate used oil and the other four drums are located outside near some old vehicles.*

12. Were the drums that were sampled by the EPA inspectors on or after December 13, 2013 the same drums from which Heritage- Crystal Clean obtained the liquid it hauled away on or about October 15, 2013?

*Mr. Jean-Louis stated the five drums currently on site are the same drums that Heritage-Crystal Clean obtained the liquid from that they hauled away.*

13. Prior to October 15, 2013, did anyone tell you or did you receive any notification from anyone informing you that the liquids in the five drums obtained from Franco Fregapane or any other person contained PCBs, polychlorinated biphenyls, or transformer fluid? If so, identify how and when you became aware of what type of liquid was in the drums. Did anyone tell you that the liquid in those drums would not be accepted by a used oil recycling company?

*Mr. Jean-Louis stated that Heritage- Crystal Clean contacted him about two to three weeks after they originally removed the oil in the drums from the site and told him there was a problem regarding the oil. He said that Heritage-Crystal clean told him the oil was contaminated, but they did not say with what. Mr. Jean-Louis also said that Heritage-Crystal Clean told him that he would be responsible for paying for the disposal of the contaminated oil.*

14. Have there been other times when you accepted oil from the person who provided the drums referred to above or from any other person?

*Mr. Jean-Louis stated that he has never accepted oil form Mr. Fregapane or any other person prior to accepting the five drums in question.*

15. How much were you paid to pick up or receive the oil? Provide any documents or receipts of such payment.

*Mr. Jean-Louis stated that he was not paid any money for picking up the five drums.*

16. When was oil removed from the storage tank located at G & G Auto prior to October 15, 2013 and who removed the oil prior to that date?

*Mr. Jean-Louis stated that he does not know who picked up oil from the tank prior to the October 15, 2013 visit by Heritage-Crystal Clean.*

17. On or about October 15, 2013, did Heritage-Crystal Clean also pump oil out of the storage tank located at G & G Auto? If so, approximately how much oil was in the storage tank at 44 Albe Drive just before it was pumped out by Heritage-Crystal Clean on or about October 15, 2013?

*Mr. Jean-Louis stated that he did not know how much oil was in the tank prior to being pumped out by Heritage-Crystal Clean.*

18. Identify all sources of liquid that you added to the storage tank between October 15, 2013 and the date it was previously pumped out.

*Mr. Jean-Louis stated that he has not added any liquids to the tank since Heritage-Crystal Clean pumped it out in October 2013.*

19. Provide the name and address of every person who may have added oil to the storage tank between October 15, 2013 and the date when it was previously pumped out.

*Mr. Jean-Louis stated that he does not know if anyone else added oil to the storage tank prior to October 15, 2013.*

At this time, the EPA inspector presented the TSCA Subpoena No. 476 to Mr. Georges Jean-Louis. Mr. Jean Louis accepted the subpoena and the inspectors told Mr. Jean-Louis needed to answer all of the questions contained in the subpoena and return that information to EPA within 10 calendar days after receiving the subpoena. The EPA inspectors also signed "Certification of Service" form certifying that TSCA Subpoena No. 476 was hand delivered to Mr. Georges Jean-Louis (See Attachment No. 2).

The inspectors accompanied by Mr. Jean- Louis then went outside of the building to observe the location of the drums in question. The blue metal 55 gallon drum observed next to the oil storage tank (See Photo No. 5) and the three 55 gallon drums, two blue plastic and one red metal stored next to an old truck (See Photo No 2) were identified by Mr. Jean-Louis as four of the five drums that he had picked up from Mr. Fregapane. The EPA inspectors then observed another 55 gallon red metal drum stored outside behind an old pickup truck bed. When asked about this drum, Mr. Jean-Louis stated that it was one of the five drums that he had picked up from Mr. Fregapane.

The EPA inspectors then collected samples for PCB analysis from two of the aforementioned drums. The information regarding the samples is as follows:

Sample No. G & G 6, wipe sample collected from 55 gallon red metal drum, marked "PCB" with spray paint (See Photo No 12). The EPA inspectors used pre-weighed wipe #G9129033-B (See Attachment No. 3). The wipe was placed into the end of a clean glass drum thief, lowered into the drum and then wiped along the sides and bottom of the drum. The glass drum thief was removed from the drum and the wipe was then removed from the end of the drum thief and placed into a clean glass 8 ounce sample jar.

Sample No. G & G 7, oil sample collected from the 55 gallon red metal drum that was observed behind the old pickup truck bed. This drum had the word "full" written on the side of the drum (See Photo No. 14), and a used oil label affixed to the top of the drum (See Photo No. 13). The EPA inspectors used a clean glass drum thief to determine how much oil was in the drum. The drum thief was lowered into the drum and when removed, the inspectors observed the drum thief contained about three inches of oil. Using the same drum thief, the EPA inspectors extracted oil from the drum and placed it into a 40 ml glass vial.

The EPA inspectors also collected a wipe blank sample. The EPA inspectors placed a clean wipe into a clean 8 ounce glass jar. The EPA inspectors used pre-weighed wipe #G9129033-A (See Attachment No. 3) for the blank sample.

All of the aforementioned samples remained in the custody of the EPA inspectors and were delivered to the EPA, Region III laboratory located at Fort Meade, Maryland for PCB analysis.

The inspectors did take some photographs of the shop in Suite 100 (See Photo Nos. 15, 16, 17 & 18). Prior to leaving the site, the EPA inspectors did present a TSCA Notice of Inspection, A TSCA Inspection Confidentiality Notice, and a TSCA Receipt for Samples and Documents to Mr. Georges Jean – Louis. Mr. Jean-Louis accepted the forms but he did not want to sign the forms.

The EPA inspectors left the site at approximately 2:10pm and drove to the 4376 Kirkwood St. Georges Road site. The inspectors arrived at the site at approximately 2:25pm. The door to the building was locked. The inspectors left this site and drove to the 2480 McCoy Road site. Just after arriving at this location, Mr. Franco Fregapane arrived at the site. The EPA inspectors presented their credentials to Mr. Fregapane identifying them as authorized representatives of the Agency.

The EPA inspectors asked Mr. Fregapane about the five drums of oil that Mr. Jean-Louis said he had picked up from Mr. Fregapane's Kirkwood St. Georges Road site. Mr. Fregapane said that as far as he recalls he has never given Mr. Jean-Louis any drums of oil. He said that occasionally he would sell a drum of gasoline or diesel fuel to Mr. Jean-Louis. He also said that Mr. Jean-Louis picked up six drums of gasoline from the 1354 Porter Road site back in July 2012. The EPA inspectors did describe to Mr. Fregapane the five drums in question as being two red metal drums, one blue metal drum and two blue plastic drums. Mr. Fregapane said that he never used plastic drums.



Mr. Fregapane said that he operated a scrap metal business (FNJ Enterprises) at the 1354 Porter Road location from 2009 to May 2012. He said that he would bring in junk cars and strip out all of the metal parts. He said any oil drained from the cars would be picked up by a used oil recycler. He also said that if he drained any gasoline from the cars he would put it in drums and sell it. Mr. Fregapane said that he moved the business from the Porter Road site to a larger facility located at 1600 South DuPont Highway in July 2012. He then said that shortly after moving to the South DuPont Highway site, there was a fire which destroyed the building. He said at that time he dissolved the scrap metal business (FNJ Enterprises). Mr. Fregapane said that he moved to 4376 Kirkwood St. Georges Road and now operates a business known as JNF Industrial. Mr. Fregapane said the new business consists mainly of contracting with companies for dismantling manufacturing equipment. He said he will store the equipment at his site until the company finds a buyer for the equipment. Once the equipment is sold, Mr. Fregapane will deliver the equipment to the buyer. He said the equipment was mainly wood working equipment, metal working equipment and process equipment.

Mr. Fregapane said that he first met Mr. Jean-Louis in 2011. He said he would go to the Albe Drive site and buy used cars for scrapping. The inspectors asked Mr. Fregapane how he disposed of used oil drained from vehicles when he operated his scrap business. Mr. Fregapane said that he and his former wife, Jacqueline Fregapane, were equal partners in FNJ Enterprises and that she usually handled the disposal of any used oils through a used oil recycler. He said that he did not remember the name of the used oil recycler and when asked about any records that might be available Mr. Fregapane said that all of the records from the FNJ Enterprises were destroyed in the fire at the South DuPont Highway site.

The inspectors next accompanied Mr. Fregapane to his current business location at 4376 Kirkwood St. Georges Road site. The inspectors went into the building and observed that it contained what appeared to be various pieces of process equipment. Mr. Fregapane said that he still does a small amount of scrap metal recycling which consists of 55 gallon metal drums that contained hydraulic fluids. There were a number of empty red metal drums located just outside of the building. The drums appeared to be in good condition. Mr. Fregapane said that he purchases the drums from a company, brings them to his location and then drains out a small amount of residual fluid from the drums and then sells them for scrap.

Prior to leaving the site, the EPA inspector, Gerard Crutchley, presented the TSCA Subpoena No. 477 to Mr. Franco Fregapane (See Attachment No. 4). Mr. Fregapane accepted the subpoena and the inspector told Mr. Fregapane he needed to answer all of the questions contained in the subpoena and return that information to EPA within 10 calendar days after receiving the subpoena. The EPA inspectors also signed "Certification of Service" form certifying that TSCA Subpoena No. 477 was hand delivered to Mr. Fregapane (See Attachment No. 5).

At this time the EPA inspectors left the site and returned to the EPA, Region III laboratory at Ft. Meade. The samples from the 44 Albe Drive site were recorded on a chain of custody sheet and then signed over to laboratory personnel. The analytical results indicated that the wipe sample collected from the red metal drum that had the word PCB sprayed on the side of the drum contained 316,970 mg/kg of PCBs (Arochlors 1016 & 1260). The oil sample collected from the other red metal drum contained 8.57 mg/kg of PCBs (Arochlor 1260). The final analytical report received from the laboratory is provided as an attachment to this report (See Attachment No. 6).

Attachment No. 1

G & G Auto

FNJ Enterprises

2/7/14

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029**

**TOXIC SUBSTANCES CONTROL ACT SUBPOENA**  
(Subpoena Duces Tecum)

**TO: Georges Jean-Louis**

G&G Auto

44 Albe Drive

Newark, Delaware 19702

153 Piano Drive

Harmony Woods

Newark, Delaware 19713

14 Foxton Drive

Newark, Delaware 19702

36 Golf View Drive, Apt C4

Newark, Delaware 19702-1762

**TSCA SUBPOENA NO. 476**

This is a subpoena issued under the authority of Section 11(c) of the Toxic Substances Control Act ("TSCA" or "the Act"), 15 U.S.C. § 2610(c). You are hereby required to provide the information requested below to the United States Environmental Protection Agency--Region III ("EPA") within ten (10) calendar days after you receive this Subpoena.

TSCA authorizes the EPA to regulate unreasonable risks to human health and the environment arising from the manufacture, processing, distribution in commerce, use, or disposal of chemical substances or mixtures. In carrying out its obligations under TSCA, the EPA is authorized under Section 11(c) of the Act to require by subpoena the attendance and testimony of witnesses, the production of reports, papers and documents, answers to questions, and such other information as the EPA deems necessary. Pursuant to the authority of Section 11(c) of TSCA, failure or refusal to comply with this Subpoena may result in initiation of court proceedings in a United States district court against the recipient of the subpoena to compel compliance with the subpoena. Any failure to obey such order of the court may be punished by such court as contempt thereof.

Pursuant to Section 16 of TSCA, 15 U.S.C. § 2615, and the Adjustment of Civil Monetary Penalties for Inflation, 40 C.F.R. Part 19, EPA is authorized to seek civil penalties of up to \$37,500 per day of violation of any of the provisions of TSCA, or, in the case of knowing or willful violations, criminal fines of up to \$37,500 per day of violation and/or imprisonment up to one year. In addition, the Criminal Fines Enforcement Act of 1984, P.L. 98-596, provides for the imposition of fines greater than the amount specified in TSCA under certain circumstances.

The issuance of this document does not preclude the issuance of additional subpoenas relating to this matter to you or to any other person.

You are required to sign your responses and attest under oath that your responses are true, accurate, and complete. An Affidavit for your completion and signature accompanies this Subpoena. Your response shall be sent to EPA representative Kelly Bunker, at the address provided on page 5, below, unless it contains confidential business information.

Pursuant to the regulations appearing at 40 C.F.R. Part 2, subpart B, you are entitled to assert a business confidentiality claim covering any part of the submitted information. Any such claim for confidentiality must conform to the requirements set forth in 40 C.F.R. §§ 2.203(b) and 2.306. Unless such a confidentiality claim is asserted at the time you submit the required information, the EPA may disclose this information to the public without further notice to you. Information subject to a business confidentiality claim may be disclosed to the public only to the extent set forth in the above-cited regulations.

If any portion of your response(s) to this subpoena contains information that you claim as business confidential, you should submit that portion of the response in accordance with the following procedures. The material itself should be marked to indicate that it is claimed confidential. It should be placed in an envelope addressed to Kyle Chelius and marked "Confidential Business Information - To be Opened By Addressee Only." The envelope should then be placed in a second, "outer" envelope addressed to:

Kyle Chelius  
Document Control Officer (3LC61)  
Land and Chemicals Division  
U.S. Environmental Protection Agency, Region III  
1650 Arch Street  
Philadelphia, PA 19103-2029

The package containing the confidential business information portion of your response should then be mailed, by registered mail, to Mr. Chelius, EPA Document Control Officer.

#### DEFINITIONS

As used herein the terms listed below have the meanings indicated.

"Document" means the original or an identical and readable copy thereof, and all nonidentical copies (whether different from the original by reason of notations made on such copies or otherwise), regardless of origin location, of any writings or records of any type or description, however created, produced or reproduced, including but not limited to any final contracts, contingency contracts, riders, agreements, papers, books, records, letters, photographs, correspondence, communications, telegrams, cables, telex messages, memoranda, notes, notations, work papers, transcripts, minutes, reports and recordings of telephone or other conversations, or of interviews, conferences, or other meetings, affidavits, statements, summaries, opinions, reports, studies, analyses, evaluations, jottings, agendas, bulletins, notices, announcements, advertisements, instructions, charts, manuals, blueprints, brochures, publications, schedules, price lists, client lists, journals,

statistical records, desk calendars, appointment books, diaries, lists, tabulations, sound recordings, computer printouts, data processing program libraries, data processing input and output, microfilm, books of accounts, records and invoices reflecting business operations, all records kept by electronic, photographic or mechanical means, any notes or drafts related to the foregoing, and all things similar to any of the foregoing, however denominated.

“PCBs” means Polychlorinated Biphenyls as defined at 40 C.F.R. § 761.3.

“Heritage-Crystal Clean” means Heritage-Crystal Clean, Inc. a used oil collection and recycling company which collected used oil from 44 Albe Drive in Bear, Delaware on or about October 15, 2013.

“G&G Auto” means the business which you were operating at 44 Albe Drive in Bear, Delaware during 2013.

#### INFORMATION REQUIRED TO BE SUBMITTED TO EPA

You are required to answer the following questions and provide copies of all documents that pertain to each question or the information you provide. In responding to this subpoena, you must base your responses on information in your possession or control, or reasonably available to you. If you cannot fully answer or fully provide the information requested in any specific question below, answer as much of the question as you possibly can with the resources available to you, by providing all information in your possession, under your control, or reasonably available to you. If any information necessary for a complete response is not in your possession, under your control, or reasonably available to you, indicate this fact in your response and identify every person and source that either possesses or is likely to possess such information.

***Questions 1 through 15, below, pertain to the tank of used oil and five (5) drums of liquid located at G&G Auto which were offered to Heritage-Crystal Clean to haul away for disposal or recycling on or about October 15, 2013.***

1. State the name, address and telephone number of the person from whom you picked up the drums of oil that you subsequently offered to Heritage-Crystal Clean for disposal or recycling on or about October 15, 2013.
2. What is the address of the location from which the drums were picked up and transported to G&G Auto?
3. Did you pick up and transport the drums to G&G Auto personally? If not, state the name, address and telephone number of the person who did pick up and transport the drums to G&G Auto. If you picked up the drums, how did you transport the drums to G&G Auto? Did you use your personal or business vehicle or did you rent a vehicle to transport the drums to G&G Auto?

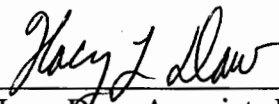
4. What did the person from whom you received the drums ask you to do with the drums? Please be specific. Was it a verbal or written request?
5. Were there actually 5 drums? If not, how many drums did you pick up or were delivered to G&G Auto?
6. On what date did you or another person pick up those drums? If you don't know the exact date, provide the month and year when you picked them up and state whether it was on a week day or weekend.
7. Did the person from whom you obtained the drums identify the source of the oil and type of equipment from which he obtained it?
8. Did the person from whom you obtained the drums state how that person obtained the liquid contained in each drum?
9. Who removed the liquid from each of those drums and where was the liquid placed?
10. After the liquid was removed from each of the five drums, was any other liquid or solid placed in any of those drums? After the oil was removed from each of the five drums, did you or anyone else rinse any of those drums? If so, what was added to each drum and why was that substance added? Who added the substance to each drum or rinsed it? When did that person add the substance or rinse the drum?
11. Describe what happened to each and every drum obtained from the person who provided the drums referred to above after the liquid was removed from it. Where is each drum located now?
12. Were the drums that were sampled by the EPA inspectors on or after December 13, 2013 the same drums from which Heritage-Crystal Clean obtained the liquid it hauled away on or about October 15, 2013?
13. Prior to October 15, 2013, did anyone tell you or did you receive any notification from anyone informing you that the liquids in the five drums obtained from Franco Fregapane or any other person contained PCBs, polychlorinated biphenyls, or transformer fluid? If so, identify how and when you became aware of what type of liquid was in the drums. Did anyone tell you that the liquid in those drums would not be accepted by a used oil recycling company?
14. Have there been other times when you accepted oil from the person who provided the drums referred to above or from any other person?
15. How much were you paid to pick up or receive the oil? Provide any documents or receipts of such payment.
16. When was oil removed from the storage tank located at G&G Auto prior to October 15, 2013 and who removed the oil prior to that date?

17. On or about October 15, 2013, did Heritage-Crystal Clean also pump liquids out of the storage tank located at G&G Auto? If so, approximately how much oil was in the storage tank at 44 Albe Drive just before it was pumped out by Heritage-Crystal Clean on or about October 15, 2013?
18. Identify all sources of liquid that you added to the storage tank between October 15, 2013 and the date when it was previously pumped out.
19. Provide the name and address of every person who may have added oil to the storage tank between October 15, 2013 and the date when it was previously pumped out.

If you have any questions regarding this subpoena, please contact Mr. John Ruggero, Senior Assistant Regional Counsel, at (215) 814-2142. If any portion of your answer to this Subpoena is not confidential business information, that portion should be submitted by first class mail, or any equally reliable means, to Ms. Kelly Bunker at the following address:

Kelly Bunker  
Environmental Scientist (3LC61)  
Land and Chemicals Division  
U.S. Environmental Protection Agency  
Region III  
1650 Arch Street  
Philadelphia, PA 19103-2029

Issued in Philadelphia, PA this 4<sup>th</sup> day of <sup>February</sup> ~~January~~, 2014.

  
\_\_\_\_\_  
Harry Daw, Associate Director  
Office of Toxics and Pesticides  
Land and Chemicals Division

**BEFORE THE UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY-REGION III**

**IN THE MATTER OF:**

**Georges Jean-Louis**

**AFFIDAVIT RESPONDING TO TSCA SUBPOENA NO. 476**

I, the undersigned affiant, first being duly sworn, upon an oath, depose and say:

1. Attached hereto are \_\_\_\_\_ pages of narrative written responses and photocopies of documents and/or records requested by EPA which are produced along with this affidavit in response to TSCA Subpoena No. 476.
2. I have made a diligent search and inquiry for all information, documents and records which are reasonably described in TSCA Subpoena No. 476. I have not found or located, and I have not been told about, and I have no knowledge of, any documents or records coming within the descriptions set forth in the said TSCA Subpoena No. 476 which have not been copied and submitted with, or otherwise identified with particularity within, the response to TSCA Subpoena No. 476 that accompanies this affidavit.
3. I hereby certify, under penalty of law, that I have personally examined and am familiar with the information and all attached documents and records submitted in response to TSCA Subpoena No. 476 and that, based upon my personal knowledge and upon my inquiry of any other individual(s) immediately responsible for obtaining such information, documents and/or records, I believe that such information is true, accurate and complete.
4. I acknowledge that this affidavit is submitted to the United States in connection with a matter within the jurisdiction of EPA and that any material false statement of fact herein may be a federal crime under 18 United States Code Section 1001.

Sign: \_\_\_\_\_ Date: \_\_\_\_\_

Print name: \_\_\_\_\_ Official Title: \_\_\_\_\_

Address: \_\_\_\_\_

SWORN AND SUBSCRIBED TO before me, the undersigned Notary Public, on this

\_\_\_\_\_ day of \_\_\_\_\_, 2014.

\_\_\_\_\_  
Notary Public in and for the State of \_\_\_\_\_ residing at \_\_\_\_\_



Attachment No. 2

G & G Auto

FNJ Enterprises

2/7/14

UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103

CERTIFICATE OF SERVICE

I hereby certify that on Feb. 7,, 2014 I hand-delivered to Mr. Georges

Jean-Louis a copy of TSCA Subpoena No. 476 at the address shown below:

44 ALBE DRIVE  
NEWARK, DE 19702

2/7/14  
Date

Gerald Crutchley  
Gerard Crutchley  
US EPA Environmental Science Center  
701 Mapes Road  
Fort Meade, MD 20755-5350  
410-305-2780

Witnessed by  
[Signature]

Attachment No. 3

G & G Auto

FNJ Enterprises

2/7/14

### Wipe Sample Initial Wts

G9129033 - A	4.963 g
G9129033 - B	5.329 g
G9129033 - C	5.271 g
G9129083 - D	5.285

- handled wipe samples w/  
tweezers that were rinsed 3X  
with DCM then hexane.

Wt. Set: SNB82

date: 2-4-14

Analyst: Adam Molnar

Attachment No. 4

G & G Auto

FNJ Enterprises

2/7/14

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029

**TOXIC SUBSTANCES CONTROL ACT SUBPOENA**  
(Subpoena Duces Tecum)

<b>TO: Franco Fregapane</b>	)	
	)	
2480 McCoy Road	)	<b>TSCA SUBPOENA NO. 477</b>
Bear, Delaware 19701	)	
	)	
1476 Kirkwood St. Georges Road	)	
Bear, Delaware 19701	)	
	)	
1354 Porter Road	)	
Bear, Delaware 19701	)	
	)	
3151 Wrangle Hill Road	)	
Bear, Delaware 19701	)	
	)	
P.O. Box 368	)	
Hockessin, Delaware 19707	)	
	)	
P.O. Box 68	)	
Hockessin, Delaware 19707	)	

This is a subpoena issued under the authority of Section 11(c) of the Toxic Substances Control Act ("TSCA" or "the Act"), 15 U.S.C. § 2610(c). You are hereby required to provide the information requested below to the United States Environmental Protection Agency--Region III ("EPA") within ten (10) calendar days after you receive this Subpoena.

TSCA authorizes the EPA to regulate unreasonable risks to human health and the environment arising from the manufacture, processing, distribution in commerce, use, or disposal of chemical substances or mixtures. In carrying out its obligations under TSCA, the EPA is authorized under Section 11(c) of the Act to require by subpoena the attendance and testimony of witnesses, the production of reports, papers and documents, answers to questions, and such other information as the EPA deems necessary. Pursuant to the authority of Section 11(c) of TSCA, failure or refusal to comply with this Subpoena may result in initiation of court proceedings in a United States district court against the recipient of the subpoena to compel compliance with the subpoena. Any failure to obey such order of the court may be punished by such court as contempt thereof.

Pursuant to Section 16 of TSCA, 15 U.S.C. § 2615, and the Adjustment of Civil Monetary Penalties for Inflation, 40 C.F.R. Part 19, EPA is authorized to seek civil penalties of

up to \$37,500 per day of violation of any of the provisions of TSCA, or, in the case of knowing or willful violations, criminal fines of up to \$37,500 per day of violation and/or imprisonment up to one year. In addition, the Criminal Fines Enforcement Act of 1984, P.L. 98-596, provides for the imposition of fines greater than the amount specified in TSCA under certain circumstances.

The issuance of this document does not preclude the issuance of additional subpoenas relating to this matter to you or to any other person.

You are required to sign your responses and attest under oath that your responses are true, accurate, and complete. An Affidavit for your completion and signature accompanies this Subpoena. Your response shall be sent to EPA representative Kelly Bunker, at the address provided on page 5, below, unless it contains confidential business information.

Pursuant to the regulations appearing at 40 C.F.R. Part 2, subpart B, you are entitled to assert a business confidentiality claim covering any part of the submitted information. Any such claim for confidentiality must conform to the requirements set forth in 40 C.F.R. §§ 2.203(b) and 2.306. Unless such a confidentiality claim is asserted at the time you submit the required information, the EPA may disclose this information to the public without further notice to you. Information subject to a business confidentiality claim may be disclosed to the public only to the extent set forth in the above-cited regulations.

If any portion of your response(s) to this subpoena contains information that you claim as business confidential, you should submit that portion of the response in accordance with the following procedures. The material itself should be marked to indicate that it is claimed confidential. It should be placed in an envelope addressed to Kyle Chelius and marked "Confidential Business Information - To be Opened By Addressee Only." The envelope should then be placed in a second, "outer" envelope addressed to:

Kyle Chelius  
Document Control Officer (3LC61)  
Land and Chemicals Division  
U.S. Environmental Protection Agency, Region III  
1650 Arch Street  
Philadelphia, PA 19103-2029

The package containing the confidential business information portion of your response should then be mailed, by registered mail, to Mr. Chelius, EPA Document Control Officer.

#### DEFINITIONS

As used herein the terms listed below have the meanings indicated.

**"Document"** means the original or an identical and readable copy thereof, and all nonidentical copies (whether different from the original by reason of notations made on such copies or otherwise), regardless of origin location, of any writings or records of any type or description, however created, produced or reproduced, including but not limited to any final contracts, contingency contracts, riders, agreements, papers, books, records,

letters, photographs, correspondence, communications, telegrams, cables, telex messages, memoranda, notes, notations, work papers, transcripts, minutes, reports and recordings of telephone or other conversations, or of interviews, conferences, or other meetings, affidavits, statements, summaries, opinions, reports, studies, analyses, evaluations, jottings, agendas, bulletins, notices, announcements, advertisements, instructions, charts, manuals, blueprints, brochures, publications, schedules, price lists, client lists, journals, statistical records, desk calendars, appointment books, diaries, lists, tabulations, sound recordings, computer printouts, data processing program libraries, data processing input and output, microfilm, books of accounts, records and invoices reflecting business operations, all records kept by electronic, photographic or mechanical means, any notes or drafts related to the foregoing, and all things similar to any of the foregoing, however denominated.

**“Drum”** means each and every container, barrel, or drum of liquid that was possessed, held, stored, transported, shipped, received, or controlled, directly or indirectly, by you or any business with which you are affiliated including, but not limited to, FNJ Enterprises, LLC and JNF Industrial Surplus LLC during calendar year 2012 or 2013.

**“G&G Auto”** means the business owned and/or operated by Georges Jean-Louis and located at 44 Albe Drive in Bear, Delaware during 2013.

#### INFORMATION REQUIRED TO BE SUBMITTED TO EPA

You are required to answer the following questions and provide copies of all documents that pertain to each question or the information you provide. In responding to this subpoena, you must base your responses on information in your possession or control, or reasonably available to you. If you cannot fully answer or fully provide the information requested in any specific question below, answer as much of the question as you possibly can with the resources available to you, by providing all information in your possession, under your control, or reasonably available to you. If any information necessary for a complete response is not in your possession, under your control, or reasonably available to you, indicate this fact in your response and identify every person and source that either possesses or is likely to possess such information.

1. Did you provide or transfer drums of liquid to Mr. Georges Jean-Louis, owner/operator of G&G Auto, at any time prior to October 15, 2013? What was the agreement between you and Mr. Jean-Louis regarding what to do with the drums?
2. How many drums did you transfer to Mr. Jean-Louis or G&G Auto?
3. What was in the drums transferred or provided to Mr. Jean-Louis or G&G Auto and where did the contents of the drums come from?
4. Did Mr. Jean-Louis pick up the drums, did you deliver them to him, or did someone else transport the drums to Mr. Jean-Louis or G&G Auto? If you delivered the drums to him, to what address did you deliver the drums and how did you transport the drums? Did you use your personal or business vehicle or did you rent a vehicle? If another person or company transported the drums, please give the name, address and phone number of the person who



transported the drums and the address to which the drums were delivered.

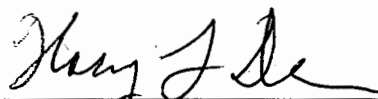
5. Did you receive money for providing the drums to Mr. Jean-Louis? How much money did you receive?
6. Did you pay Mr. Jean-Louis for taking the drums? How much did you pay him?
7. Do you own or operate or have you owned and/or operated businesses located at or near any of the following locations: 1354 Porter Road, Bear, Delaware; 2480 McCoy Road, Bear, Delaware; 1600 South DuPont Highway, St. George, DE; or 4376 Kirkwood Street/St. Georges Road, St. Georges, DE? If so, what is or was the nature of the business conducted at each location?
8. Do you own or operate the businesses called FNJ Enterprises, LLC (hereinafter referred to as "FNJ"), and JNF Industrial Surplus LLC (hereinafter referred to as "JNF")?
9. Did FNJ, JNF or you handle scrap metal or operate a scrap metal recycling business at any time during 2012-2013?
10. Did FNJ, JNF or you handle or have possession of any electrical transformers or other electrical equipment during 2012-2013?
11. Provide the address of every location where FNJ, JNF, or you handled or held scrap metal during 2012-2013.
12. Did you remove oil from any article or piece of equipment that was handled or possessed by FNJ, JNF or you during 2012-2013?
13. Describe and identify each article and piece of equipment from which oil was removed at any location where FNJ, JNF, or you conducted business during 2012-2013.
14. Describe each oil-filled article, container, or piece of equipment that was obtained or held in the possession of FNJ, JNF, or you during 2012 and 2013 and provide the name, address and phone number of the company or person from whom each oil-filled article, container, or piece of equipment was obtained by FNJ, JNF, or you.
15. Did FNJ, JNF, or you possess or transport one or more containers of oil during 2012-2013? How many containers of oil did FNJ, JNF, or you possess or transport during 2012-2013? If you don't know the exact number, provide the approximate number and volumes of the containers. Where were those containers held while you had possession of them?
16. Provide the name, address, and phone number of each and every person who transported any oil from any location where FNJ, JNF or you had possession of the oil.
17. How much oil did each person transport from each location where FNJ, JNF or you held the oil?

18. Why was the oil transported from each location where FNJ, JNF or you held the oil? What happened to each shipment of oil after it was transported from each location where FNJ, JNF, or you held the oil?
19. Who made the decision to transport oil from each location where FNJ, JNF or you held the oil?
20. Did FNJ, JNF or you pay any person to transport oil from any location where FNJ, JNF or you held it? Whom did FNJ, JNF or you pay for transporting the oil? When was each payment made and how much was paid?
21. Did FNJ, JNF or you sell oil to anyone? Who bought the oil? How much oil did each person buy and how much did each person pay for the oil?
22. Provide all information and data relating to chemical analyses of all oil that FNJ, JNF, or you possessed or transported at any time during 2012-2013.
23. Did FNJ, JNF, you, or any business with which you are affiliated possess, hold, store, transport, ship, receive, or control any drum or piece of equipment containing polychlorinated biphenyls, or PCBs, or any substance mixed with polychlorinated biphenyls or PCBs, as defined at 40 C.F.R. § 761.3, during 2012-2013? If so, describe each and every drum and piece of equipment which contained the polychlorinated biphenyls or PCBs. Also, identify when and the person from whom you obtained each and every drum and piece of equipment which contained the polychlorinated biphenyls or PCBs.

If you have any questions regarding this subpoena, please contact Mr. John Ruggero, Senior Assistant Regional Counsel, at (215) 814-2142. If any portion of your answer to this Subpoena is not confidential business information, that portion should be submitted by first class mail, or any equally reliable means, to Ms. Kelly Bunker at the following address:

Kelly Bunker  
Environmental Scientist (3LC61)  
Land and Chemicals Division  
U.S. Environmental Protection Agency  
Region III  
1650 Arch Street  
Philadelphia, PA 19103-2029

Issued in Philadelphia, PA this 4 day of February, 2014.



---

Harry Daw, Associate Director  
Office of Toxics and Pesticides  
Land and Chemicals Division

**BEFORE THE UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY-REGION III**

**IN THE MATTER OF:**

**Franco Fregapane**

**AFFIDAVIT RESPONDING TO TSCA SUBPOENA NO. 477**

I, the undersigned affiant, first being duly sworn, upon an oath, depose and say:

1. Attached hereto are \_\_\_\_\_ pages of narrative written responses and photocopies of documents and/or records requested by EPA which are produced along with this affidavit in response to TSCA Subpoena No. 477.
2. I have made a diligent search and inquiry for all information, documents and records which are reasonably described in TSCA Subpoena No. 477. I have not found or located, and I have not been told about, and I have no knowledge of, any documents or records coming within the descriptions set forth in the said TSCA Subpoena No. 477 which have not been copied and submitted with, or otherwise identified with particularity within, the response to TSCA Subpoena No. 477 that accompanies this affidavit.
3. I hereby certify, under penalty of law, that I have personally examined and am familiar with the information and all attached documents and records submitted in response to TSCA Subpoena No. 477 and that, based upon my personal knowledge and upon my inquiry of any other individual(s) immediately responsible for obtaining such information, documents and/or records, I believe that such information is true, accurate and complete.
4. I acknowledge that this affidavit is submitted to the United States in connection with a matter within the jurisdiction of EPA and that any material false statement of fact herein may be a federal crime under 18 United States Code Section 1001.

Sign: \_\_\_\_\_ Date: \_\_\_\_\_

Print name: \_\_\_\_\_ Official Title: \_\_\_\_\_

Address: \_\_\_\_\_

SWORN AND SUBSCRIBED TO before me, the undersigned Notary Public, on this

\_\_\_\_\_ day of \_\_\_\_\_, 2014.

\_\_\_\_\_  
Notary Public in and for the State of \_\_\_\_\_ residing at \_\_\_\_\_

Attachment No. 5

G & G Auto

FNJ Enterprises

2/7/14

UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103

CERTIFICATE OF SERVICE

I hereby certify that on Feb. 7, 2014 I hand-delivered to Mr. Franco

Fregapane a copy of TSCA Subpoena No. 477 at the address shown below:

4376 KIRKWOOD ST. GEORGES ROAD  
ST. GEORGES, DE.

2/7/14  
Date

Gerard Crutchley  
Gerard Crutchley  
US EPA Environmental Science Center  
701 Mapes Road  
Fort Meade, MD 20755-5350  
410-305-2780

Witnessed by  
[Signature]

Attachment No. 6

G & G Auto

FNJ Enterprises

2/7/14



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region 3 Environmental Science Center  
Office of Analytical Services and Quality Assurance  
701 Mapes Road  
Fort Meade, Maryland 20755-5350



**Final Analytical Report**

Site Name.....	G & G Auto
Sample Collection Date(s).....	02/07/14 13:28- 02/07/14 13:37
Contact.....	Kelly Bunker
Report Date.....	02/26/14 17:02
Project #.....	NSF 665
Work Order.....	1402006

**Analyses included in this report:**

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PCB Aroclors by SW846 8082A

Approved for Release

1402006 FINAL

NSF 665

02 26 14 1702

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OASQA Representative



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region 3 Environmental Science Center  
Office of Analytical Services and Quality Assurance  
701 Mapes Road  
Fort Meade, Maryland 20755-5350



Site Name: G & G Auto

Project #: NSF 665

**Report Narrative**

**PCB Aroclor Analysis Note:**

Sample 1402006-01 was a clean napkin which was initially weighed in the lab prior to sampling. This initial weight was recorded. The napkin was then soaked in Hexane and used to wipe the inside of an empty oil drum. Upon receipt at the lab the napkin was allowed to sit in an open tray for 24 hours, in a fume hood, to dry any residual solvent or moisture left on the napkin. The napkin was then re-weighed. The difference between the final weight and the initial weight is the sample weight used for calculations.

Sample 1402006-03 was a clean napkin which was initially weighed in the lab prior to transportation to the sampling site. This initial weight was recorded. This napkin was kept clean and serves as a field blank. The sample weight used for calculations is the initial weight of the napkin.

Results for 1402006-01 and 1402006-03 should be considered dry weight results even if wet weight is indicated on the report. Samples were dried for 24 hours in a fume hood prior to weighing.

Samples 1402006-01 and 1402006-03 were extracted via accelerated solvent extraction, EPA method 3545A.

Sample 1402006-02 was prepared via waste dilution, EPA 3580A.

The added surrogate compound, Decachlorobiphenyl, was recovered high in sample 1402006-01. This was due to positively interfering peaks present in the sample because of the high concentration of PCB Aroclors present. The second surrogate, Tetrachloro-meta-xylene, should be used to gauge procedural effects on sample results.

1402006 FINAL

NSF 665

02/26/2014





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region 3 Environmental Science Center  
Office of Analytical Services and Quality Assurance  
701 Mapes Road  
Fort Meade, Maryland 20755-5350



Site Name: G & G Auto

Project #: NSF 665

ANALYTICAL REPORT FOR SAMPLES

Station ID	Laboratory ID	Matrix	Date Sampled	Date Received
G&G 6	1402006-01	Wipe	2/07/14 13:30	2/10/14 13:53
G&G 7	1402006-02	Oil	2/07/14 13:37	2/10/14 13:53
WB	1402006-03	Wipe	2/07/14 13:28	2/10/14 13:53

**Project #: NSF 665**

**REGION 3**  
Curtis Bldg., 6th & Walnut Sts.  
Philadelphia, Pennsylvania 19106

### CHAIN OF CUSTODY RECORD

[illegible]

Distribution: Original Accompanies Shipment: Copy to Coordinator Field Files



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region 3 Environmental Science Center  
Office of Analytical Services and Quality Assurance  
701 Mapes Road  
Fort Meade, Maryland 20755-5350

**Site Name:** G & G Auto**Project #:** NSF 665**Station ID:** G&G 6**Lab ID:** 1402006-01**Sample Matrix:** Wipe**Date Collected:** 02/07/2014**Organochlorine Pesticides and PCBs****Targets**

Analyte	Result mg/kg wet	Flags Qualifiers	Quantitation Limit	Dilution	Prepared	Analyzed	Method/SOP#
<b>Aroclor-1016</b>	<b>5970</b>		532	50	02/11/14	02/20/14 09:11	3545A/8082A/R3QA207
Aroclor-1221	U		10.6	1	02/11/14	02/13/14 08:41	3545A/8082A/R3QA207
Aroclor-1232	U		10.6	1	02/11/14	02/13/14 08:41	3545A/8082A/R3QA207
Aroclor-1242	U		10.6	1	02/11/14	02/13/14 08:41	3545A/8082A/R3QA207
Aroclor-1248	U		10.6	1	02/11/14	02/13/14 08:41	3545A/8082A/R3QA207
Aroclor-1254	U		10.6	1	02/11/14	02/13/14 08:41	3545A/8082A/R3QA207
<b>Aroclor-1260</b>	<b>311000</b>		10600	1000	02/11/14	02/13/14 04:58	3545A/8082A/R3QA207
Aroclor-1262	U		10.6	1	02/11/14	02/13/14 08:41	3545A/8082A/R3QA207
Aroclor-1268	U		10.6	1	02/11/14	02/13/14 08:41	3545A/8082A/R3QA207

**Surrogates**

Analyte	Result mg/kg wet	Flags Qualifiers	%Recovery Limits	%Recovery	Prepared	Analyzed	Method/SOP#
Surrogate: Tetrachloro-meta-xylene	9.48		89 %	30-150	02/11/14	02/19/14 18:26	3545A/8082A/R3QA207
Surrogate: Decachlorobiphenyl	69.8	1	656 %	30-150	02/11/14	02/13/14 06:31	3545A/8082A/R3QA207



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region 3 Environmental Science Center  
Office of Analytical Services and Quality Assurance  
701 Mapes Road  
Fort Meade, Maryland 20755-5350

**Site Name:** G & G Auto**Project #:** NSF 665**Station ID:** G&G 7**Lab ID:** 1402006-02**Sample Matrix:** Oil**Date Collected:** 02/07/2014**Organochlorine Pesticides and PCBs****Targets**

Analyte	Result mg/kg	Flags Qualifiers	Quantitation Limit	Dilution	Prepared	Analyzed	Method/SOP#
Aroclor-1016	U		1.00	1	02/11/14	02/13/14 02:48	3580A/8082A/R3QA207
Aroclor-1221	U		1.00	1	02/11/14	02/13/14 02:48	3580A/8082A/R3QA207
Aroclor-1232	U		1.00	1	02/11/14	02/13/14 02:48	3580A/8082A/R3QA207
Aroclor-1242	U		1.00	1	02/11/14	02/13/14 02:48	3580A/8082A/R3QA207
Aroclor-1248	U		1.00	1	02/11/14	02/13/14 02:48	3580A/8082A/R3QA207
Aroclor-1254	U		1.00	1	02/11/14	02/13/14 02:48	3580A/8082A/R3QA207
<b>Aroclor-1260</b>	<b>8.57</b>		1.00	1	02/11/14	02/13/14 02:48	3580A/8082A/R3QA207
Aroclor-1262	U		1.00	1	02/11/14	02/13/14 02:48	3580A/8082A/R3QA207
Aroclor-1268	U		1.00	1	02/11/14	02/13/14 02:48	3580A/8082A/R3QA207

**Surrogates**

Analyte	Result mg/kg	Flags Qualifiers	%Recovery Limits	Prepared	Analyzed	Method/SOP#
<i>Surrogate: Tetrachloro-meta-xylene</i>	0.809		<b>81 %</b> 30-150	02/11/14	02/13/14 02:48	3580A/8082A/R3QA207
<i>Surrogate: Decachlorobiphenyl</i>	0.793		<b>79 %</b> 30-150	02/11/14	02/13/14 02:48	3580A/8082A/R3QA207



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region 3 Environmental Science Center  
Office of Analytical Services and Quality Assurance  
701 Mapes Road  
Fort Meade, Maryland 20755-5350

**Site Name:** G & G Auto**Project #:** NSF 665**Station ID:** WB**Lab ID:** 1402006-03**Sample Matrix:** Wipe**Date Collected:** 02/07/2014**Organochlorine Pesticides and PCBs****Targets**

Analyte	Result mg/kg wet	Flags Qualifiers	Quantitation Limit	Dilution	Prepared	Analyzed	Method/SOP#
Aroclor-1016	U		0.201	1	02/11/14	02/13/14 00:20	3545A/8082A/R3QA207
Aroclor-1221	U		0.201	1	02/11/14	02/13/14 00:20	3545A/8082A/R3QA207
Aroclor-1232	U		0.201	1	02/11/14	02/13/14 00:20	3545A/8082A/R3QA207
Aroclor-1242	U		0.201	1	02/11/14	02/13/14 00:20	3545A/8082A/R3QA207
Aroclor-1248	U		0.201	1	02/11/14	02/13/14 00:20	3545A/8082A/R3QA207
Aroclor-1254	U		0.201	1	02/11/14	02/13/14 00:20	3545A/8082A/R3QA207
Aroclor-1260	U		0.201	1	02/11/14	02/13/14 00:20	3545A/8082A/R3QA207
Aroclor-1262	U		0.201	1	02/11/14	02/13/14 00:20	3545A/8082A/R3QA207
Aroclor-1268	U		0.201	1	02/11/14	02/13/14 00:20	3545A/8082A/R3QA207

**Surrogates**

Analyte	Result mg/kg wet	Flags Qualifiers	%Recovery Limits	Prepared	Analyzed	Method/SOP#
Surrogate: Tetrachloro-meta-xylene	0.207		103 % 30-150	02/11/14	02/13/14 00:20	3545A/8082A/R3QA207
Surrogate: Decachlorobiphenyl	0.201		100 % 30-150	02/11/14	02/13/14 00:20	3545A/8082A/R3QA207



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region 3 Environmental Science Center  
Office of Analytical Services and Quality Assurance  
701 Mapes Road  
Fort Meade, Maryland 20755-5350



Site Name: G & G Auto

Project #: NSF 665

QC Data  
Organochlorine Pesticides and PCBs

Analyte	Result	Quantitation Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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Batch BB41104 - EPA 3580A PCB/Pest

Blank (BB41104-BLK1)

Prepared: 02/11/14 12:17 Analyzed: 02/12/14 23:06

Aroclor-1016	U	1.00	mg/kg							
Aroclor-1221	U	1.00	"							
Aroclor-1232	U	1.00	"							
Aroclor-1242	U	1.00	"							
Aroclor-1248	U	1.00	"							
Aroclor-1254	U	1.00	"							
Aroclor-1260	U	1.00	"							
Aroclor-1262	U	1.00	"							
Aroclor-1268	U	1.00	"							
Surrogate: Tetrachloro-meta-xylene	1.04		"	1.0000		104	30-150			
Surrogate: Decachlorobiphenyl	1.03		"	1.0000		103	30-150			

LCS (BB41104-BS1)

Prepared: 02/11/14 12:17 Analyzed: 02/12/14 23:43

Aroclor-1016	10.0	1.00	mg/kg	10.000		100	70-130			
Aroclor-1221	U	1.00	"				70-130			
Aroclor-1232	U	1.00	"				70-130			
Aroclor-1242	U	1.00	"				70-130			
Aroclor-1248	U	1.00	"				70-130			
Aroclor-1254	U	1.00	"				70-130			
Aroclor-1260	10.6	1.00	"	10.000		106	70-130			
Aroclor-1262	U	1.00	"				70-130			
Aroclor-1268	U	1.00	"				70-130			
Surrogate: Tetrachloro-meta-xylene	1.06		"	1.0000		106	30-150			
Surrogate: Decachlorobiphenyl	1.04		"	1.0000		104	30-150			

Matrix Spike (BB41104-MS1)

Source: 1402006-02

Prepared: 02/11/14 12:17 Analyzed: 02/13/14 03:07

Aroclor-1016	8.20	1.00	mg/kg	10.000	0.00	82	50-150			
Aroclor-1221	U	1.00	"		0.00		50-150			
Aroclor-1232	U	1.00	"		0.00		50-150			
Aroclor-1242	U	1.00	"		0.00		50-150			
Aroclor-1248	U	1.00	"		0.00		50-150			
Aroclor-1254	U	1.00	"		0.00		50-150			
Aroclor-1260	22.5	1.00	"	10.000	8.57	139	50-150			
Aroclor-1262	U	1.00	"		0.00		50-150			
Aroclor-1268	U	1.00	"		0.00		50-150			
Surrogate: Tetrachloro-meta-xylene	0.762		"	1.0000		76	30-150			
Surrogate: Decachlorobiphenyl	0.741		"	1.0000		74	30-150			



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Project #: NSF 665

QC Data  
Organochlorine Pesticides and PCBs

Analyte	Result	Quantitation Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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Batch BB41104 - EPA 3580A PCB/Pest

Matrix Spike Dup (BB41104-MSD1)		Source: 1402006-02		Prepared: 02/11/14 12:17		Analyzed: 02/13/14 03:25				
Aroclor-1016	7.90	1.00	mg/kg	10.000	0.00	79	50-150	4	25	
Aroclor-1221	U	1.00	"		0.00		50-150		25	
Aroclor-1232	U	1.00	"		0.00		50-150		25	
Aroclor-1242	U	1.00	"		0.00		50-150		25	
Aroclor-1248	U	1.00	"		0.00		50-150		25	
Aroclor-1254	U	1.00	"		0.00		50-150		25	
Aroclor-1260	21.1	1.00	"	10.000	8.57	125	50-150	11	25	
Aroclor-1262	U	1.00	"		0.00		50-150		25	
Aroclor-1268	U	1.00	"		0.00		50-150		25	
Surrogate: Tetrachloro-meta-xylene		0.749	"	1.0000		75	30-150			
Surrogate: Decachlorobiphenyl		0.736	"	1.0000		74	30-150			

Batch BB41105 - EPA 3545A PCB/Pest

Blank (BB41105-BLK1)		Prepared: 02/11/14 12:21		Analyzed: 02/12/14 23:24						
Aroclor-1016	U	0.0333	mg/kg wet							
Aroclor-1221	U	0.0333	"							
Aroclor-1232	U	0.0333	"							
Aroclor-1242	U	0.0333	"							
Aroclor-1248	U	0.0333	"							
Aroclor-1254	U	0.0333	"							
Aroclor-1260	U	0.0333	"							
Aroclor-1262	U	0.0333	"							
Aroclor-1268	U	0.0333	"							
Surrogate: Tetrachloro-meta-xylene		0.0338	"	0.033333		101	30-150			
Surrogate: Decachlorobiphenyl		0.0340	"	0.033333		102	30-150			



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Site Name: G & G Auto

Project #: NSF 665

QC Data  
Organochlorine Pesticides and PCBs

Analyte	Result	Quantitation Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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Batch BB41105 - EPA 3545A PCB/Pest

LCS (BB41105-BS1)

Prepared: 02/11/14 12:21 Analyzed: 02/13/14 00:01

Aroclor-1016	0.357	0.0333	mg/kg wet	0.33333		107	70-130			
Aroclor-1221	U	0.0333	"				70-130			
Aroclor-1232	U	0.0333	"				70-130			
Aroclor-1242	U	0.0333	"				70-130			
Aroclor-1248	U	0.0333	"				70-130			
Aroclor-1254	U	0.0333	"				70-130			
Aroclor-1260	0.352	0.0333	"	0.33333		106	70-130			
Aroclor-1262	U	0.0333	"				70-130			
Aroclor-1268	U	0.0333	"				70-130			
Surrogate: Tetrachloro-meta-xylene	0.0344		"	0.033333		103	30-150			
Surrogate: Decachlorobiphenyl	0.0340		"	0.033333		102	30-150			





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**Notes and Definitions**

I An interference exists which masks the true response. See report narrative for explanation.

%REC Percent Recovery

RPD Relative Percent Difference

U Analyte included in the analysis, but not detected at or above the quantitation limit.

NR Not Reported

**QUANTITATION LIMIT:** The lowest concentration of an analyte that can be reliably measured within specified limits of precision and accuracy for a specific laboratory analytical method and that takes into account analytical adjustments made during sample preparation and analysis.

**SOLID SAMPLE RESULTS - REPORTING PROTOCOL:** Solid samples where % Solids (percent dry wt at 105 degrees C) has been performed, are analyzed wet and converted to a dry weight result for reporting purposes. This is routine for organics and most inorganic analyses. When metals and mercury analyses are requested, solid samples are routinely analyzed and reported on a dry weight basis. Solid samples for metals/mercury are prepared for analysis by an initial drying at 60 degree C and homogenization before digestion. Oil-type samples will be analyzed and reported on a wet weight basis for all analyses because of the nature of the sample. Any exceptions to the protocol will be noted with a qualifier

**ON-DEMAND:** The term 'on-demand' analysis, if noted in the report narrative, refers to Section 13.1.4 in the Region III OASQA Laboratory Quality Manual, which provides procedures for non-routine analyses or analytes.

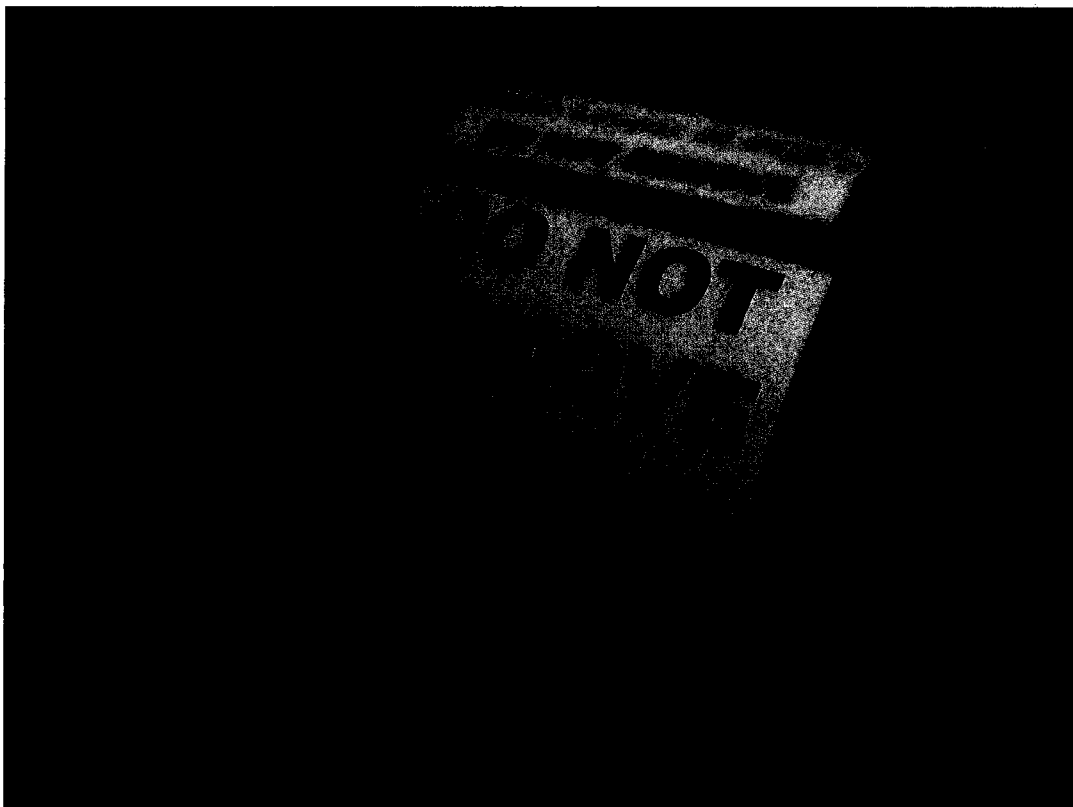


Photo No. 1 – G & G Auto (2-7-14)



Photo No. 2 – G & G Auto (2-7-14)



Photo No. 3 – G & G Auto (2-7-14)

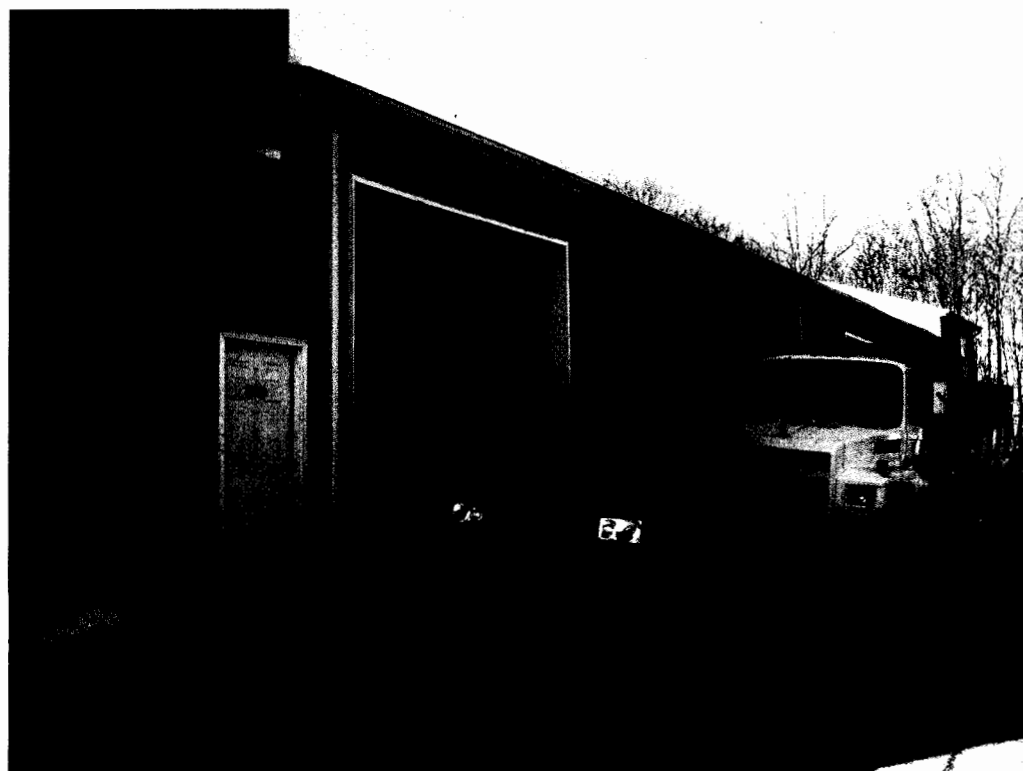


Photo No. 4 – G & G Auto (2-7-14)



Photo No. 5 – G & G Auto (2-7-14)



Photo No. 6 – G & G Auto (2-7-14)



Photo No. 7 – G & G Auto (2-7-14)



Photo No. 8 – 2480 McCoy Road site (2-7-14)



Photo No. 9 – 2480 McCoy Road site (2-7-14)

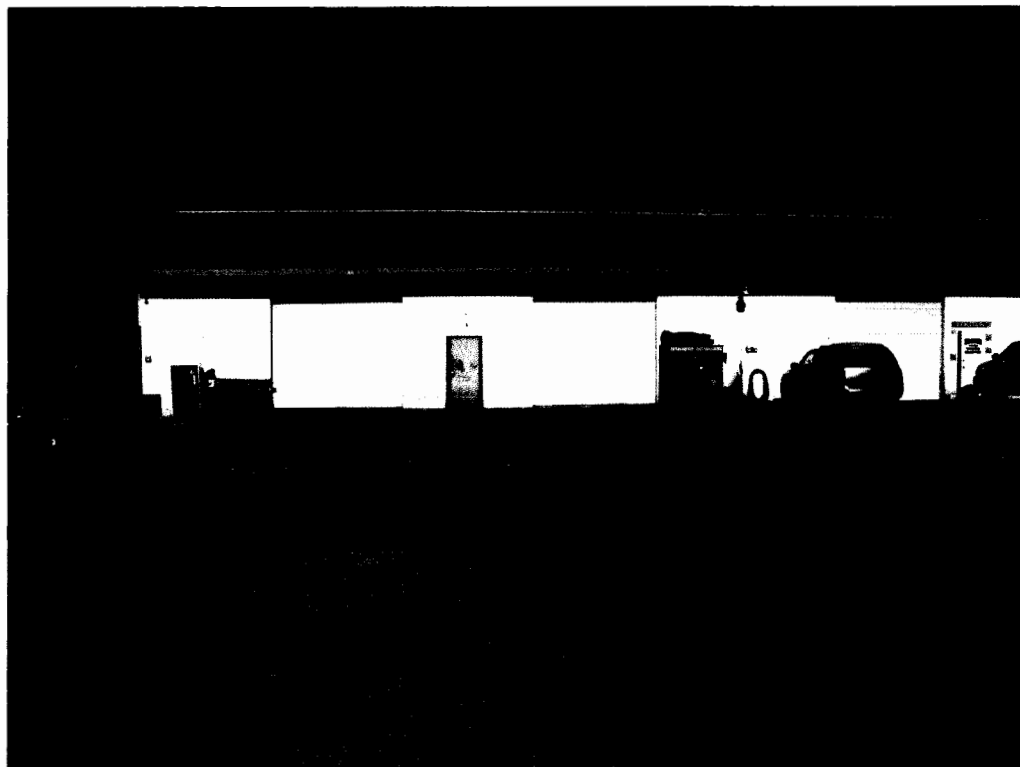


Photo No. 10 – 4376 Kirkwood St. Georges Road site (2-7-14)



Photo No. 11 – 4376 Kirkwood St. Georges Road site (2-7-14)





Photo No. 12 – G & G Auto (2-7-14)



Photo No. 13 – G & G Auto (2-7-14)



Photo No. 14 – G & G Auto (2-7-14)



Photo No. 15 – G & G Auto (2-7-14)



Photo No 16 – G & G Auto (2-7-14)



Photo No. 17 – G & G Auto (2-7-14)

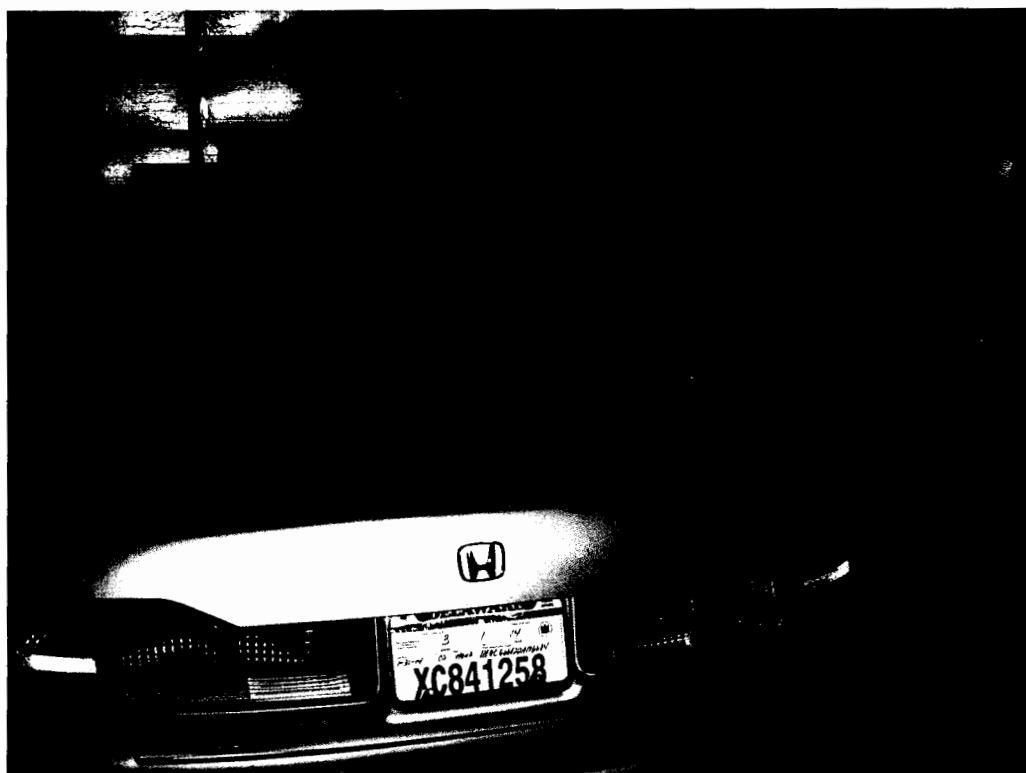


Photo No. 18 – G & G Auto (2-7-14)